



Public Service of New Hampshire

New Hampshire Yankee Division

George S. Thomas
Vice President-Nuclear Production

NYN- 88047

April 11, 1988

United States Nuclear Regulatory Commission
Washington, DC 20555

Attention: Document Control Desk

References: (a) Facility Operating License NPF-56, Construction Permit
CPPR-136, Docket Nos. 50-443 and 50-444

(b) PSNH Letter (NYN-87121), dated October 19, 1987,
"Changes to Seabrook Station Operational Quality Assurance
Program", G. S. Thomas to USNRC

Subject: Clarification of Changes to the Seabrook Station Operational Quality
Assurance Program

Gentlemen:

In response to NRC Staff and Region I requests, enclosed please find clarifications regarding FSAR Section 17.2 which were transmitted by Reference (b).

FSAR Subsection 17.2.1 is not intended to be a complete description of organizational positions within New Hampshire Yankee (NHY). It provides an overview of the NHY organization concentrating on major organizational elements that provide quality-related activities, indicates relationships with the Nuclear Quality organization, and identifies major areas of responsibility and authority.

The changes to FSAR Section 17.2 did not reduce the organizational interrelationships with the Nuclear Quality Group but merely revised the responsibilities and reporting authority within NHY to reflect the current organization.

B021
1/1

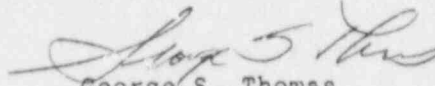
8804210059 880411
PDR ADOCK 05000443
P DCD

United States Nuclear Regulatory Commission
Attention: Document Control Desk

April 11, 1988
Page 2

Should you have any further questions concerning this matter, please contact our Bethesda Licensing Office (Mr. R. E. Sweeney) at (301) 656-6100.

Very truly yours,


George S. Thomas

Enclosure

cc: Mr. Victor Nerses, Project Manager
Project Directorate I-3
Division of Reactor Projects
United States Nuclear Regulatory Commission
Washington, DC 20555

Mr. William T. Russell
Regional Administrator
United States Nuclear Regulatory Commission
Region I
425 Allendale Road
King of Prussia, PA 19406

Mr. Antone C. Cerne
NRC Senior Resident Inspector
Seabrook Station
Seabrook, NH 03874

ENCLOSURE 1 TO NYN-88047

QUESTION NO. 1

Who now maintains communications with the Nuclear Quality Manager on matters related to the implementation of the QA Program and regulatory compliance within the Station?

RESPONSE

The Technical Projects Manager performs this QA interface function. This is a staff position reporting to the Station Manager. (See Response to Question 8).

QUESTION NO. 2

Who maintains the staff of Computer Development and Security personnel?

RESPONSE

Security and Computer Systems Manager. This is described in FSAR Subsection 17.2.1.3.(b).5.(c) (page 17.2-6).

QUESTION NO. 3

Who maintains a staff of safety personnel?

RESPONSE

The Safety Supervisor is a staff position reporting to the Nuclear Services Manager who is chairman of the Site Safety Committee. The Safety Supervisor does not coordinate industrial safety activities with QA.

QUESTION NO. 4

Who administers and monitors the performance of Station Security Services?

RESPONSE

The Security and Computer Systems Manager.

QUESTION NO. 5

Who coordinates Station drills related to security, fire protection and safety?

RESPONSE

Station drills related to fire protection and safety are coordinated through the New Hampshire Yankee (NHY) training organization under the direction of the Training Manager.

Station drills related to security are coordinated through the NHY security organization under the direction of the Security and Computer Systems Manager.

QUESTION NO. 6

Who supervises procurement, receipt inspection, handling, storage, issue of and records associated with material and services that are encompassed by the program?

RESPONSE

These activities are the responsibility of the Administrative Services Manager who reports to the Production Services Manager.

QUESTION NO. 7

Who has the responsibility for the non-licensed training function?

RESPONSE

All training, non-licensed and licensed, is under the direction of the Training Manager. The Training function is described in detail in FSAR Chapter 13. The basic non-licensed training functions remain the same; however, the reporting authority has been changed from the Assistant Station Manager to the Training Manager.

QUESTION NO. 8

Who is the Technical Projects Manager?

RESPONSE

The Technical Projects Manager is a staff position reporting to the Station Manager. He provides the Station QA interface similar to that previously defined for the Administrative Projects Manager.

QUESTION NO. 9

How frequent are meetings conducted between the Vice President and the Nuclear Quality Manager (NQM)?

RESPONSE

The need for a planned quarterly meeting is no longer necessary due to the current organization and the onsite location of the Vice President - Engineering and Quality Programs. Generally, meetings are conducted on a weekly basis. However, there is usually a daily interface to discuss quality matters.

QUESTION NO. 10

Insert A to FSAR Subsection 17.2.15.2 did not define that the NQ review was documented?

RESPONSE

It was intended that the last sentence in the first paragraph of FSAR Subsection 17.2.15.2 would cover all documentation requirements. However, to clarify the requirement, Insert A to FSAR Subsection 17.2.15.2 is provided in Enclosure 2 to identify that the Nuclear Quality Group (NQG) documents the review. This is accomplished by providing for a final NQG signature.

QUESTION NO. 11

Who does the Emergency Planning organization report to?

RESPONSE

The Executive Director of Emergency Planning reports to the NHY President and Chief Executive Officer. This reporting relationship will be described in FSAR Chapter 13.

QUESTION NO. 12

On FSAR pages 17.2-2 and 17.2-4, minor clarification of reporting responsibility is requested.

RESPONSE

Resubmitted FSAR pages 17.2-2 and 17.2-4 are provided in Enclosure 2.

ENCLOSURE 2 TO NYN-88047

Engineering and

The Vice President ~~and Director of~~ Quality Programs will mediate disputes arising within the OOAP. Where disagreement persists, the matter may be appealed to the Senior Vice President for final resolution.

17.2.1.2 Delegation of Authority and Assignment of Responsibility

- a. The Senior Vice President, while retaining full responsibility and the overall authority, has delegated the necessary authority and has assigned responsibility for the Program to the Vice President ~~and Director of~~ Quality Programs. He has assigned the Nuclear Quality Manager the responsibility to manage the programmatic aspects of the OOAP.

- Engineering and

- b. Various operational support services have been delegated to the Nuclear Services Division of the Yankee Atomic Electric Company (YAEC). The Quality Assurance Department of YAEC establishes the programs and practices necessary to ensure that such services meet appropriate quality standards. In addition, NHY reviews YAEC documentation, audits YAEC performance, performs an annual management assessment of YAEC QA activities, and coordinates the work to assure a quality work product for the Seabrook project.

17.2.1.3 Organizational Structure

NHY Organization

The NHY organizational structure discussed below is shown on Figure 17.2-1.

- a. *- Engineering and*
Vice President ~~and Director of~~ Quality Programs

- Engineering and
The Vice President ~~and Director of~~ Quality Programs is responsible for the construction and operational QA programs. He has been delegated the responsibility to develop and implement the Operational Quality Assurance Program (OOAP). In order to accomplish this he is assisted by the Nuclear Quality Group whose functions are described below.

1. Nuclear Quality Group (NOG)

The Nuclear Quality Manager has overall responsibility for assuring that the Operational Quality Assurance Program is effectively implemented by all organizations performing work on systems and equipment within the scope of the OOAP.

*Manager and
Engineering Manager* → *Rev. B*

*{ NHY Engineering, Independent Review Team, Independent
Safety Engineering Group, Reliability and Safety, Licensing and*

- o Identifies quality problems and evaluates their extent and safety implications.
- o Recommends, provides or initiates solutions to identified quality problems.
- o Verifies implementation of approved solutions to such problems.
- o Administers the audit, surveillance and inspection programs of the NHY organization.
- o Evaluates and reports on the effectiveness of the Program, and identifies trends in quality performance.
- o Refers to the Vice President ^{- Engineering and} ~~and Director of~~ Quality Programs for mediation, cases where he is unable to establish mutual agreement with, or between, other organizations involved in the implementation of the Program.
- o Is Chairman of the Nuclear Safety Audit and Review Committee (NSARC).

The Nuclear Quality Group also provides the on-site verification and assessment of the Program implementation.

The Nuclear Quality Manager receives prior notification of SORC meetings and a representative participates on a regular basis. The Nuclear Quality Group is on distribution for pertinent meeting notices, correspondence and information and a representative attends any meeting which appears appropriate. Nuclear Quality Group personnel routinely attend and participate in work schedule and status meetings to assure that they are kept abreast of day-to-day work assignments throughout the plant and that there is adequate QA/QC coverage relative to procedural and inspection controls, acceptance criteria, and QA/QC staffing and qualification of personnel to carry out QA/QC assignments.

The Nuclear Quality Group consists of the Quality Control, the Quality Assurance and the Audit and Evaluation Sections. The Quality Assurance Section contains expertise in the areas of quality engineering. The Audit and Evaluation Section contains expertise in quality assurance auditing. The Quality Control Section contains expertise in the areas of electrical, mechanical, and instrumentation and control. The sections report directly to the Nuclear Quality Manager.

The QA Surveillance Section contains expertise in construction installation requirements and performs programmatic surveillances

17.2.15.1 Identification and Control

Materials, parts or components, which are deficient in characteristic, documentation or procedure which render the quality unacceptable or indeterminate are identified as nonconformances. The Supervisor of a technical area or activity that is within the scope of the OQAP is responsible for documenting the nonconformance in accordance with established procedures, and assuring proper control to prevent inadvertent use or installation. Controls may include marking, tagging or physical segregation. Affected organizations are notified of the nonconformance and subsequent actions taken through distribution of a report describing the nonconforming item.

NHY Managers are responsible for assignment of technically qualified personnel to evaluate the extent and impact of the nonconformance to determine a disposition for the item; (i.e., repair, rework, scrap or use-as-is) and to take appropriate action, when necessary, to prevent recurrence. For nonconformances involving repair or use-as-is dispositions, procedures specify the organization responsible for the performance of an engineering review function. All dispositions are documented and signed by responsible parties.

Acceptability of rework or repair of material parts and components is verified by qualified personnel reinspecting or retesting the item as originally specified or by alternate means approved for the application.

~~A designated NHY Manager is responsible to administer the nonconformance-reporting system. The Nuclear Quality Group reviews and verifies each report of a nonconforming item.~~ A 11 11

The Nuclear Quality Manager maintains a system to recognize, evaluate, document, and assess quality trends. The system provides for periodic analysis of reports on nonconforming items, inspection, surveillance and audit reports, and the submittal of significant results to the Vice President, ~~and~~ Director of Quality Programs for review and appropriate action.

- Engineering and

Corrective action is that action taken to identify, correct and preclude recurrence of conditions adverse to the quality of activities or equipment. NHY programs identify those conditions for which corrective action may be warranted including:

Insert A to 17.2.15.2

A designated NHT Manager is responsible to administer the nonconformance reporting system. The Nuclear Quality Group reviews and ~~verifies~~ ^{documents} each report of a nonconforming item. This review verifies that the deficiency was properly and correctly stated, the disposition and corrective action are acceptable and the steps to prevent recurrence, ~~are effective.~~

assesses the effectiveness of

Rev. B